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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

## WASHOE COUNTY SCHOOL DISTRICT,

**Plaintiff.**

V

META PLATFORMS, INC.; FACEBOOK HOLDINGS, LLC; FACEBOOK PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; INSTAGRAM, LLC; SICULUS, INC.; META PAYMENTS, INC.; SNAP INC.; TIKTOK, INC.; BYTEDANCE, INC.; BYTEDANCE LTD.; TIKTOK LTD.; TIKTOK LLC; GOOGLE LLC; and YOUTUBE LLC.

### Defendants.

CASE NO. 4:23-cv-5729

MDL NO. 4:22-md-03047

## NOTICE OF LEXECON OBJECTION

1 NOTICE IS HEREBY GIVEN THAT, in accordance with Case Management Order No. 13  
 2 (MDL 3047, ECF No. 780), plaintiff Washoe County School District (“Plaintiff”) hereby asserts its  
 3 rights with respect to the jurisdiction of this Court for purposes of trial and objects to such jurisdiction  
 4 pursuant to *Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998). As stated  
 5 in Plaintiff’s complaint, the complaint is deemed to have been filed in the United States District Court  
 6 for the District of Nevada. *See* Case No. 4:23-cv-5729, ECF Nos. 1, 11; *see also* CMO 4, § II.D (MDL  
 7 3047, ECF No. 119) (“At the completion of all pretrial proceedings … this Court shall transfer such  
 8 cases to the federal district court identified by the Plaintiff....”).

9  
 10 DATED: May 17, 2024

**WAGSTAFF & CARTMELL LLP**

11  
 12 /s/ Austin Brane  
 13 Thomas P. Cartmell (*pro hac vice*)  
 14 Jonathan P. Kieffer (*pro hac vice*)  
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**Attorneys for Plaintiff Washoe County School District**

**PROOF OF SERVICE**

STATE OF MISSOURI, COUNTY OF JACKSON

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Jackson, State of Missouri. My business address is 4740 Grand Avenue, Suite 300, Kansas City, MO 64112.

On May 17, 2024, I served true copies of the following document(s) described below on the interested parties in this action as follows: **NOTICE OF LEXECON OBJECTION** using the Court's electronic filing system, thereby sending notice of the filing to all counsel of record in this matter.

I declare under penalty of injury under the laws of the State of Missouri that the foregoing is true and correct.

Executed on May 17, 2024, at Kansas City, Missouri.

*/s/ Peggy Bradshaw* \_\_\_\_\_  
Peggy Bradshaw